

# **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

JARROD STRINGER, et al.,

*Plaintiffs,*

V.

ROLANDO PABLOS, et al.,

*Defendants.*

JARROD STRINGER, et al.,

*Plaintiffs,*

V.

RUTH HUGHS, et al.,

*Defendants.*

CIVIL NO. SA-16-CV-257-OG

CIVIL NO. SA-20-CV-46-OG

## DECLARATION OF SHERI GIPSON

My name is Sheri Gipson, I am over the age of 18 and fully competent to make this declaration, and state the following:

1. I am the Assistant Chief of the Texas Department of Public Safety (DPS) Driver License Division. In this capacity, I oversee DPS's issuance of driver licenses and identification cards to residents of the State of Texas.

2. To transfer voter registration information collected through online driver license and identification card transactions conducted on the State's Texas.gov website to the Secretary of State (SOS) in a manner similar to the existing system to transfer voter registration information

collected through in-person transactions, DPS may need to modify: (1) its Driver License System (DLS) database and application, (2) the Texas.gov online process, and (3) the electronic voter registration application file sent by DPS to the SOS on a daily basis.

3. The Texas.gov website, including the driver license renewal and address change service, is under the control and authority of the Texas Department of Information Resources (DIR) and maintained by DIR's vendor, currently Deloitte. DPS does not have the ability to independently make any changes to the Texas.gov website. DPS's role in initiating changes to the driver license renewal and address change service on the Texas.gov website is limited to submitting requests for changes, working with DIR and Deloitte to design any new capabilities for interface between Texas.gov and DLS, and assisting with testing new programs. DPS has no control over the timeframe for DIR's work to make changes to the Texas.gov website.

4. In order to make changes to Texas.gov and DLS that would allow DPS to provide data captured online in a similar manner as an application made in a driver license office, DPS would need time to develop code and perform the necessary testing of changes. Exclusive of the time required to implement any changes to the data fields provided in the voter registration application file sent daily to the Secretary of State, DPS estimates that its work could be completed in, at least, seven (7) weeks. DPS's work cannot begin until DIR and its vendors have scheduled their work. Programming updates for both DPS and DIR systems must be completed prior to comprehensive integration testing.

5. In addition to the modifications referenced above, if DPS is also required to track, record, and retain each online driver license renewal and change-of-address customer's response to the voter registration questions and transmit that information to SOS, additional time will be necessary for programming and testing. These requirements are not currently part of the existing

functionality of DLS for the in-office voter registration process. The manner in which DLS is programmed does not capture and store transactional data related to the answers to the voter registration questions in a manner that is capable of broad scale reporting. DPS has never provided the applicant's response to the voter registration questions to the SOS. Additionally, DPS does not transmit any data related to applicants who answered "no" to the voter registration questions to SOS in the daily voter registration file.

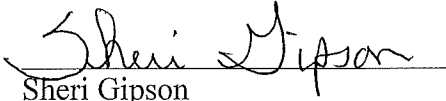
6. Implementing changes like these will require new design and development by DPS to modify the DLS database and application. DPS could not start collecting the data necessary to accomplish these directives until DIR and their vendor completed a redesign of the driver license renewal and address change service on Texas.gov. DPS estimates that these additional requirements would increase the time required for DPS to complete its work to at least eleven (11) weeks. DPS's work cannot begin until DIR and its vendors have scheduled their work. Programming updates for both DPS and DIR systems must be completed prior to comprehensive integration testing.

7. The programming by DPS and DIR through their vendor, Deloitte, can be requested immediately; however, this action may cause critical delays to currently scheduled DLS updates related to legislative actions and operational contracts. DPS has no control over the timeframe for the SOS to make changes to their internal programs and processes.

8. My timeline estimates are for DPS's work only, exclusive of the time required for DIR, Deloitte, SOS, or any other person or group to complete their work. DPS has no control over the work of other individuals, agencies, or groups.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 27th day of January, 2020, in Austin, Texas.

  
Sheri Gipson